_			
		_	

STEVEN PATRICK THOMPSON, PRO SE PLAINTIFF

VS.

TARGET STORES, ET ALS DEFENDANT(S)

LEAVE TO PROCEED IN FORMA PAUPERIS

TAKE NOTICE THAT ON; February 7, 2007, at 9:00 O'clock in the forenoon or as soon thereafter as this matter may be heard, the undersigned Plaintiff, Pro Se, STEVEN PATRICK THOMPSON, shall apply to the United States District Court for the Third Circuit, Office of the Clerk, Peter T. Dalleo, 4209 Federal Bldg., Lockbox 18, 844 King St., Rm., 4209 Wilmington, DE 19801 for leave for an Order To Proceed In Forma Pauperis.

I am the petitioner/plaintiff in the above entitled proceeding; that, in support of my request to proceed without being required to prepay fees, cost or give security therefore, for this and all other proceedings to include free transcripts of all proceedings, court appointed attorney regarding this civil matter, subpoenas for the attendance of witnesses and production of documents. I state that because of my poverty, I am unable to pay the cost of said proceeding or give security therefore; that I believe I am entitled to relief.

Page 2 of 11

other related bills.

Because of my poverty I have no assets, nor do I own or posses any real estate. My liabilities includes a rental in the amount of \$600.00 per month, I have an outstanding student loan, and medical bills, utilities, food, medication and

The nature of my action, defense, or other proceeding or the issues I intend to present are briefly stated;

This action arises out of the illegal and wrongful retaliation by the above named Defendants. Mr. Thompson was hired on about April 2005, and has continued to be harass by the Defendants he was wrongfully terminated by way of constructive discharge on November 29, 2006 the Defendant has continued to engage in discriminatory harassment of Mr. Thompson because of his race after receiving his demand notice on or about October 31, 2006. Mr. Thompson sought to resolve the issues that he was confronted with but to no avail "Discrimination" is intended to be construed broadly. It includes harassment, derogatory or demeaning language, and, generally, any conduct towards the named groups that is both harmful and discriminatory.

- 6. By subjecting Plaintiff to a hostile work environment on the basis of his race, Defendants violated the Fourteenth Amendment to the United States Constitution as made actionable pursuant to 42 U.S.C. §1983 and Title VII.
- 7. By subjecting Plaintiff to quid pro quo on going continuing racial harassment, Defendants violated the Fourteenth Amendment to the United States Constitution as made actionable pursuant to 42 U.S.C. §1983 as well as Title VII and other related claims set forth herein.
- 8. By discriminating against Plaintiff in the terms and conditions of his employment race, Defendants have subjected Plaintiff to wrongful constructive dischare because of racial discrimination in violation of the Fourteenth Amendment of the United States Constitution, as made actionable pursuant to 42 U.S.C. §1983 as well as Title VII and other related claims set forth herein. By

subjecting Plaintiff to a hostile work environment, quid pro quo harassment and discrimination, all on the basis of his race, retaliation, Defendants violated as well as Title VII and other related claims set forth herein. Target stores is liable for the misconduct of its agents under the doctrine of respondent superior.

The Jurisdiction of this forum is predicated upon violations of the Plaintiff's Civil and Constitutional Law Against Discrimination because of race Negligence, Infliction of Emotional Distress, Pain and Suffering, Malicious Abuse of Process, fraud and misrepresentation the acts of the Defendants has infringe on this Plaintiff's Civil Rights. **Retaliation** with regards to Civil Rights claims, as set forth herein and other **common law and torts** which this Court has pendent jurisdiction over the state law claims.

Plaintiff's motion for Leave to Proceed as an indigent in this matter and all other current matters before this court and its jurisdiction is hereby presented here. This Plaintiff petitions this Court for access in accordance with equal protection of the law.

CERTIFICATION

I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment. No brief is necessary at this time in support of the plaintiff's motion.

Respectfully submitted by,

Dated: February 7, 2007

RELIEF SOUGHT

Plaintiff petitions this court for relief as set forth in his motion to Proceed In Forma Pauperis and complaint. I petition the court to appoint an attorney to help me with this complex matter. I ask for emergent relief in filing this complaint.

In conclusion, for the aforementioned reasons standing alone, or for their cumulative effect, it is respectfully urge that the plaintiff's Motion be granted.

Respectfully submitted by,

Dated: February 7, 2007

cc: Confidential distribution

CASE NO.	•
STEVEN PATRICK THOMPSON, PRO SE PLAINTIFF	
vs.	
TARGET STORES, ET ALS DEFENDANT(S)	,
	LEAVE TO PROCEED IN FORMA PAUPERIS
	ORDER
THIS MATTER having been opened to	o the Court upon the motion of the
Plaintiff Steven Patrick Thompson, Pro Se, fo	or Notice of Motion To Proceed In
Forma Pauperis, and the Court having consideration	dered the moving papers, and the
Court hereby for good cause shown has Gra	nted the Plaintiff's Motion To
Proceed In Forma Pauperis as a matter of la	w;
IT IS ON THISday of _	, 2007;
ORDERED as follows:	
IT IS FURTHER ORDERED that a co	py of this Order be served upon
Defendants within days of receipt her	reof by ordinary or certified mail or
via electronic mail.	
U.S. MAGISTRATE JUDGE	

\sim	٨	C	N	O	
٠.	м		14	v	

STEVEN PATRICK THOMPSON, PRO SE PLAINTIFF

VS.

TARGET STORES, ET ALS DEFENDANT(S)

LEAVE TO PROCEED IN FORMA PAUPERIS

OF MOTION

I, Steven Patrick Thompson am the Plaintiff in the above-captioned matter.

I make this certification in support my motion for Leave To Proceed In Forma

Pauperis. Plaintiff ask this Court to grant relief with regards to his application.

I do not expect any major changes to my monthly income or expenses.

Because of my poverty I have no assets, nor do I own or posses any real estate.

My monthly income is \$2,300.00, My liabilities includes a rental in the amount of \$600.00 per month, I have an outstanding student loan\$200,00, utilities \$100.00 food \$200.00, recreation \$100.00, entertainment \$100.00, newspapers \$20.00, magazines \$20.00, etc., auto expenses \$150, Motor Vehicle Rental \$200.00, Cable Bill \$50.00, Telephone \$125.00, Cell Phone \$100, Savings Acct. \$0.00, Checking Acct. \$150.00 and other related bills.

I certify that the above statements made by me are true and that if any of the statements are willfully false, I am subject to punishment.

Respectfully submitted by,

Steven Patrick Thompson, Pro Se

CASE	NU.	

STEVEN PATRICK THOMPSON, PRO SE **PLAINTIFF**

VS.

TARGET STORES, ET ALS DEFENDANT(S)

> LEAVE TO PROCEED <u>IN FORMA PAUPERIS</u>

CERTIFICATION OF PROCESS

I, Steven Patrick Thompson certify that the foregoing statements made by me in my complaint and this motion are true. I am aware that if any of the foregoing statements made by me is willfully false, I am subject to punishment. regular/certified mail to the Defendants. This letter servers as notice to file my complaint against the Defendants with the U.S. District for the District of Delaware Third Circuit.

Respectfully submitted by

ŠTEVEN PATRIČK THOMPSÓN, PRO SE

DATED: February 7, 2007

COPIES TO:

U.S. DISTRICT COURT Peter T. Dalleo, Court Clerk 4209 Federal Bldg. Lockbox 18 844 King St., Rm. 4209 Wilmington, DE 19801

STATE ATTORNEY GENERAL Carvel State Office Bldg. 820 N. French St., 8th Flr. Wilmington 1980

Target Stores, Inc. 33 S. 6th Street, CC-3500 Minneapolis, MN 55402

Target Store Brandywine 1050 Brandywine Parkway Wilmington, DE 19803

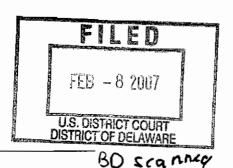
CASE NO.

STEVEN PATRICK THOMPSON, PRO SE PLAINTIFF

- 07-72 -

VS.

TARGET STORES, ET ALS DEFENDANT(S)



LEAVE TO PROCEED IN FORMA PAUPERIS

COVER SHEET LETTER

Dear Court Clerk:

On or about February 7, 2007 the United States District Court for the District of Delaware I ask that you filed my original complaint and grant my motion as attached.

Should you have any questions please contact me.

Respectfully submitted by,

STEVEN PATRICK THOMPSON